REDACTED – FOR PUBLIC INSPECTION

EX PARTE
VIA ELECTRONIC FILING

July 31, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *In the Matter of Special Access for Price Cap Local Exchange Carriers* (WC Docket No. 05-25); *AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services* (RM-10593)

Dear Ms. Dortch:

On July 29, 2015, Jim Butman, Eric Pulvermacher and the undersigned of TDS Telecommunication Corporation ("TDS") met with Eric Ralph, Deena Shetler, Aleks Yankelevich, Virginia Metallo and William Kehoe of the Wireline Competition Bureau to discuss the above-referenced proceeding.

TDS described the difficulties that its competitive LEC subsidiary ("TDS CLEC") faces when attempting to deliver retail services to business customers. These difficulties are due in large part to TDS CLEC's inability to obtain competitive pricing for access to last-mile facilities. TDS also provided the staff with the attached documents, which contain overall cost data for TDS's basic cost categories between 2010 and 2014, as well as information pertaining to TDS's Ethernet over Copper ("EoC") device costs between 2006 and 2014.

The attached documents contain information that the Wireline Competition Bureau has deemed confidential under the protective order in this proceeding.[1] Pursuant to the procedures outlined in the protective order, the original confidential version of this filing is being submitted to the Secretary's office under separate cover. Additionally, two copies of the confidential version are being delivered to Andrew Mulitz of the Pricing Policy Division of the Wireline Competition Bureau, and one machine-readable copy of the redacted version is being filed electronically via ECFS.

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[1] *Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Modified Protective Order, 20 FCC Rcd. 1994 (2005).

Please do not hesitate to contact me with any questions regarding this matter.

Respectfully submitted,

/s/ Steve Pitterle

Steve Pitterle
Manager – Carrier Relations,
TDS Telecommunications Corporation

Attachments

cc: Meeting Participants

ATTACHMENT 1

Based on TDS Booked Financial Data

	A	B	C	D	E	F
1	**Expense**					
2	**Type**	**2010**	**2011**	**2012**	**2013**	**2014**
3	Real Estate to Total Expense %					
4	Switching to Total Expense %					
5	Transmission to Total Expense %					
6	Outside Plant (Copper and Fiber) to Total Expense %					
7	Field Expenses to Total Expense %					
8	Back Office to Total Expense %					
9						
10	**Total Expenses Year over Year % Delta**					
11						
12	**% Expenses due to Salary, Wages and Benefits**					
	Type	**2010**	**2011**	**2012**	**2013**	**2014**
13	Real Estate					
14	Switching Electronics					
15	Transmission Electronics					
16	Outside Plant (Copper and Fiber)					
17	Field Expenses					
18	Back Office					
19						

Based on TDS Booked Financial Data

	A	B	C	D	E	F
20	**Asset**					
21	**Type**	**2010**	**2011**	**2012**	**2013**	**2014**
22	Real Estate	[redacted]				
23	Switching Electronics					
24	Transmission Electronics					
25	Outside Plant (Copper and Fiber)					
26						
27	**Total Asset Year over Year % Delta**		[redacted]			
28						
29	**% Break Down of Transmission Electronics**					
30	**Type**	**2010**	**2011**	**2012**	**2013**	**2014**
31	Direct Ethernet Electronics % of Transmission	[redacted]				
32	All other Transmission Electronics					
33						

Based on TDS Booked Financial Data

	A	B	C	D	E	F
34	**Cable and Wire % of Asset**					
35	**Type**	**2010**	**2011**	**2012**	**2013**	**2014**
36	Copper					
37	Fiber					
38	Poles/Conduit/Structure/etc					
39						
40						

Cross Reference Descriptions - Expense

	Description One	Description Two
43	Real Estate	General Support (i.e. Building, Vehicles)
44	Switching Electronics	Central Office Switching Maintenance
45	Transmission Electronics	Central Office Transmission Maintenance
46	Outside Plant (Copper and Fiber)	Outside Plant (Copper and Fiber) Maintenance
47	Field Expenses	Network Operations
48	Back Office	Customer and Corporate Operations

ATTACHMENT 2

	A	B	C	D	E	F	G
	All Assets Amounts Reflect Only Material costs No Overheads						
1	**Ethernet over Copper One to One**						
2	Name	Type	Year	Units	YOY Change in Investment Dollars	% of Total Ethernet over Copper Investment for Current Year	Change in Investments Per Unit Per Year
3	Device 1	Bonded Copper	2006				
4			2007				
5		**Bandwidth**	2008				
6		10 Mbps	2009				
7			2010				
8			2011				
9			2012				
10			2013				
11			2014				
12							
13	Name		Year	Units	YOY Change in Investment Dollars	% of Total Ethernet over Copper Investment for Current Year	Change in Investments Per Unit Per Year
14	Device 2	Bonded T-1	2008				
15			2009				
16		**Bandwidth**	2010				
17		15 Mbps	2011				
18			2012				
19			2013				
20			2014				
21							
22	Name		Year	Units	YOY Change in Investment Dollars	% of Total Ethernet over Copper Investment for Current Year	Change in Investments Per Unit Per Year
23	Device 3	Bonded T-1	2011				
24			2012				
25		**Bandwidth**	2013				
26		15 Mbps	2014				

All Assets Amounts Reflect Only Material costs No Overheads

	A	B	C	D	E	F	G
27	**Aggregator of circuits in the Central Office**						
28	Name	Type	Year	Units	YOY Change in Investment Dollars	% of Total Ethernet over Copper Investment for Current Year	Change in Investments Per Unit Per Year
29	Device 4	Hub	2006	[redacted]			
30		works with Device 1	2007				
31			2008				
32		**Bandwidth**	2009				
33		20 to 40 circuits	2010				
34			2011				
35			2012				
36			2013				
37			2014				
38							
39	Name		Year	Units	YOY Change in Investment Dollars	% of Total Ethernet over Copper Investment for Current Year	Change in Investments Per Unit Per Year
40	Device 5	Hub	2008	[redacted]			
41		works with Device 2/3	2009				
42			2010				
43		**Bandwidth**	2011				
44		20 to 40 circuits	2012				
45			2013				
46							
47							
48	Name		Year	Units	YOY Change in Investment Dollars	% of Total Ethernet over Copper Investment for Current Year	Change in Investments Per Unit Per Year
49	Device 6	Hub	2011	[redacted]			
50		works with Device 2/3	2012				
51		**Bandwidth**	2013				
52		20 to 40 circuits	2014				

All Assets Amounts Reflect Only Material costs No Overheads

	A	B	C	D	E	F	G
53	**Ethernet Switch - Aggregates All Ethernet traffic**						
54	Name	Type	Year	Units	YOY Change in Investment Dollars	% of Total Ethernet over Copper Investment for Current Year	Change in Investments Per Unit Per Year
55	Device 7	IP Switch	2008	[redacted]			
56		Aggregates IP Traffic	2009				
57		**Bandwidth**	2010				
58		24 1 Gig ports	2011				
59			2012				
60			2013				
61			2014				
62							